

1 DAVID K. WILLINGHAM (SBN 198874)
d.willingham@kslaw.com
2 JAMIE A. LANG (SBN 253769)
j.lang@kslaw.com
3 **KING & SPALDING LLP**
4 633 West Fifth Street, Suite 1600
5 Los Angeles, CA 90071
6 Telephone (213) 218-4005
7 YELENA KOTLARSKY
(pro hac vice)
y.kotlarsky@kslaw.com
8 JOSEPH L. ZALES
(pro hac vice)
j.zales@kslaw.com
9 **KING & SPALDING LLP**
10 1185 Avenue of the Americas,
11 34th Floor
12 New York, NY 10036
13 Telephone (212) 556-2207
14 PAUL J. WATFORD
p.watford@wsgr.com
15 **WILSON SONSINI GOODRICH**
& ROSATI
16 953 E 3rd St, Ste 100
17 Los Angeles, CA 90013
18 Telephone (323) 210-2951
Attorneys for Defendant *Terren Scott Peizer*

1 STEPHEN A. BEST
(pro hac vice)
sbest@brownrudnick.com
2 **BROWN RUDNICK LLP**
3 601 13th St NW, Suite 600
4 Washington, DC 20005
5 Telephone (202) 536-1737
6 ANGELA M. PAPALASKARIS
(pro hac vice)
apapalaskaris@brownrudnick.com
7 **BROWN RUDNICK LLP**
8 7 Times Square
9 New York, NY 10036
10 Telephone (212) 209-4817
11 STEPHEN COOK (SBN 204446)
scook@brownrudnick.com
12 **BROWN RUDNICK LLP**
13 2211 Michelson Drive, 7th Floor
14 Irvine, CA 92612
15 Telephone (949) 440-0215

19 **UNITED STATES DISTRICT COURT**
20 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**

21 UNITED STATES OF AMERICA,
22 Plaintiff,
23 v.
24 TERREN SCOTT PEIZER
25 Defendant.

26 Case No. 2:23-cr-00089(A)-DSF

27 **DECLARATION OF DAVID K.**
WILLINGHAM IN SUPPORT OF
DEFENDANT TERREN PEIZER'S
APPLICATION FOR LEAVE TO
FILE UNDER SEAL PORTIONS OF
SENTENCING RESPONSE

28 Date: February 24, 2025
Time: 8:30 a.m.
Crtrm.: 7D
The Honorable Dale S. Fischer

1 **DECLARATION OF DAVID K. WILLINGHAM**

2 1. I am an attorney at the law firm of King & Spalding LLP and represent
3 Defendant Terren Scott Peizer in this matter. I make this declaration based on personal
4 knowledge.

5 2. Defendant Peizer seeks to seal limited portions of the Sentencing
6 Response, as identified in blue highlighting in the attached true and correct unredacted
7 copy of Peizer's Sentencing Response that is being filed under seal. The portions of the
8 document to be sealed reference Defendant's sensitive and private health and medical
9 information.

10 3. A true and correct redacted copy of Defendant Peizer's Sentencing
11 Response is being filed in the public record.

12 4. There is good cause to protect the aforementioned material from being
13 disclosed to the public, as detailed in Defendant's accompanying Application for Leave
14 to File Under Seal Portions of Defendant's Sentencing Response.

15 5. On January 23, 2025, the government indicated that it does not object to
16 the sealing of the requested materials.

17
18 I declare under the penalty of perjury and the laws of the United States that the
19 foregoing is true and correct this 29th day of January 2025, at Los Angeles, California.

20 /s/ David K. Willingham

21 David K. Willingham

22
23
24
25
26
27
28